

**REMARKS**

Claims 1-30 are all the claims pending in the application.

With respect to the objections to the drawings, Figures 1, 2a and 2b have been designated as “prior art”. Figure 4 has also been amended to change the reference numeral “3” to --31-- to eliminate the double use of the reference character 3. With respect to the other drawing objections raised in the last Office Action, the Examiner’s attention is directed to pages 16 and 17 wherein a number of amendments have been made to overcome the objections raised in the last Office Action with respect to the drawings. The proposed corrections have been submitted in red and upon approval a complete set of new formal drawings will be submitted.

With respect to the claims, Claims 1 and 21 have been amended in line 1 to delete the “SYS”. Claims 22-29 inclusive have been amended to depend from Claim 21. In view of the fact that Claims 28 and 29 now depend from Claim 21, the preamble referring to a “tool unit” is correct.

In the last Office Action Claims 1-30 inclusive were rejected under 35 U.S.C. § 103(a) as being unpatentable over Simpkin *et al.* (US Patent 5,207,309) in view of Leddet (US Patent 4,453,303).

The patent to Leddet describes an apparatus for the automatic placement of an element onto a vehicle chassis which travels on a kind of conveyor belt. The apparatus includes a movable tool unit 53 with an electrically controllable machining tool (holding device for a windscreen (see Fig. 2 in D1)) and a holding unit 62, as well as a sliding support mechanism 72,

68 in which the holding unit 62 is received, wherein the holding unit 62 is slidable in the sliding support mechanism 72, 68.

Furthermore, the apparatus comprises a sensor device EC, ED for detecting the approach of a vehicle chassis 50 and a control unit for receiving signals from the sensor device EC, ED and for controlling a movement device which moves the tool unit 53 on the basis of these signals. The sensors EC, ED measure the approach of the vehicle chassis 50 which is arranged on the conveyor belt and they give the measured signals to the control unit. On the basis of these signals the control unit controls the movement apparatus such that the tool unit 53 can be moved in accordance with the approach of the vehicle chassis 50 measured by the sensors EC, ED. The sensors EC, ED for measuring an approach of the vehicle chassis 50 are by no means comparable with the position determination unit of Claim 1 of the present invention because the position determining unit determines the position of the respective tool unit **along the sliding support mechanism (4)** whereas the approach sensors EC, ED of Leddet determine the position of the tool unit 53 **in relation to an approaching vehicle chassis 50**. Thus, paragraph (d) of Claim 1 is not described by Leddet.

The control unit for receiving signals from the approach sensors EC, ED of Leddet is only said to control the movement apparatus. It is in particular not disclosed that the control unit **is part of the tool unit 53**. The positioning determination measured by the approach sensors EC, ED of Leddet does not correspond to the position determination of the position determining unit. Thus, the features of the last paragraph of Claim 1 are not disclosed by Leddet.

The patent to Simpkin *et al.* relates to a movement control of a work unit 14 which accompanies a work piece 11 without physically influencing or effecting the work piece 11 physically.

In Fig. 1 of Simpkin *et al.* it is shown how the work units 14 are sequentially and slidably arranged on a sliding support mechanism. Each work unit 14 comprises a movement unit 18, a test unit 16, and a control unit 17 as well as sensors 26, 27.

The sensors 26, 27 detect the presence of an object in a specific distance by the energy from this object (see column 3, line 22-27), wherein the object is formed by one of the vehicles 11 on the conveyor belt. The control unit 17 enables the test unit 16 to maintain its position relative to the vehicle to the vehicle 11 by controlling the movement unit 18 (column 3, line 2-5). To achieve this control of the movement unit 18 the control unit 17 uses the signals measured by the sensors 26, 27.

Similarly, as in Leddet the positioning determination in Simpkin is hardly comparable with the position determination of Claim 1 of the present invention. That is, in Simpkin, as in Leddet, the position of the respective work unit 14 is determined relative to the passing vehicles 11 and **not the position of the respective work unit along the sliding support mechanism.**

Since Claim 1 is clearly patentable over each of the references it is not seen how the combination of these references could possibly meet the limitations of Claim 1, in particular as set forth in the last two paragraphs of Claim 1. Claim 21 sets forth the same features in the last two paragraphs as presented in the last two paragraph of Claim 1. Therefore, it is submitted that Claims 1 and 21 as well as the claims dependent therefrom are clearly allowable over Leddet in

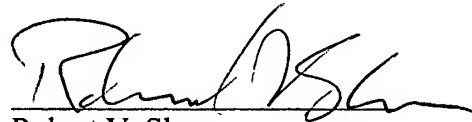
**Amendment Under 37 C.F.R. § 1.111 w/4 Annotated Sheets of Drawings**  
**USSN 10/614,824**  
**Attorney Docket Q76374**  
**December 27, 2005**

view of Simpkin. Therefore, it is respectfully requested that Claims 1-30 inclusive be allowed and the application passed to issue forthwith.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Robert V. Sloan  
Registration No. 22,775

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

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**AMENDMENTS TO THE DRAWINGS**

A copy of the drawings containing Figures 1-4 inclusive is submitted herewith showing proposed changes in red for approval to Figure 1, Figure 2a, Figure 2b and Figure 4. Upon approval of the proposed drawing corrections the drawings will be formally corrected and submitted.

Attachment: 4 Annotated Sheets